

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOSEPH A. DAOU and KAREN M. DAOU, :
 :
 Plaintiffs, : Civ. Action No. 1:20-cv-4438-DLC
 :
 vs. : **NOTICE OF MOTION**
 :
 BLC BANK, S.A.L., CREDIT LIBANAIS, S.A.L., :
 AL-MAWARID BANK, S.A.L., and BANQUE DU : ORAL ARGUMENT REQUESTED
 LIBAN, :
 :
 Defendants. :
 x

PLEASE TAKE NOTICE that upon the Memorandum of Law in support of this motion, and the pleadings and proceedings herein, Plaintiffs Joseph A. Daou and Karen M. Daou (together, “Plaintiffs”), by their undersigned counsel, will move this Court for an order striking new evidence improperly submitted by Defendants in reply in further support of their motions to dismiss, or in the alternative, considering expert declarations (ECF 88 and 89) submitted by Plaintiffs in connection with their motion for attachment (ECF 87) when adjudicating Defendants’ motions to dismiss; and granting Plaintiffs such other and further relief as the Court may deem just and proper.

Plaintiffs respectfully request an oral argument on this motion.

Dated: New York, New York
March 18, 2021

MEISTER SEELIG & FEIN LLP

By: /s/ Christopher J. Major
Christopher J. Major
Amit Shertzer
Leah A. Henry
125 Park Avenue, 7th Floor
New York, New York 10017
Tel: (212) 655-3500
Email: cjm@msf-law.com
as@msf-law.com
lah@msf-law.com
Attorneys for Plaintiffs